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7 *Counsel for Plaintiffs*

8 UNITED STATES DISTRICT COURT

9 DISTRICT OF ARIZONA

10  
11 In Re Bard IVC Filters Products  
Liability Litigation

No. MD-15-02641-PHX-DGC

12 **NOTICE OF LODGING EXHIBITS**  
13 **RELATED PLAINTIFFS' OPPOSITION**  
14 **TO DEFENDANTS' MEMORANDUM**  
15 **TO SEAL DOCUMENTS LODGED**  
16 **UNDER SEAL IN SUPPORT OF**  
17 **PLAINTIFFS' OMNIBUS SEPARATE**  
18 **STATEMENT OF FACTS IN SUPPORT**  
**OF PLAINTIFFS' RESPONSES TO**  
**DEFENDANTS' MOTIONS FOR**  
**SUMMARY JUDGEMENT IN THE**  
**BELLWETHER CASES**

19 Pursuant to LRCiv 5.6(d), Plaintiffs submits this Notice of Lodging Exhibits Under  
20 Seal Related to Plaintiff's Opposition to Defendants' Memorandum to Seal Documents  
21 Lodged Under Seal In Support of Plaintiffs' Omnibus Separate Statement of Facts in  
22 Support of Plaintiffs' Responses to Defendants' Motions for Summary Judgment in the  
23 Bellwether Cases.

24 Plaintiffs provide notice that, pursuant to LRCiv 5.6(d), they have lodged with the  
25 Court under seal two exhibits to their Opposition, Exhibits A and B: Exhibit A, Chart of  
26 Documents and Testimony Bard Seeks to Redact and Exhibit B, Chart of Documents and  
27 Testimony Bard Seeks to Seal in their Entirety.  
28

1 Defendants contend that the documents contained in the exhibits are confidential  
2 and should be filed under seal. Plaintiff does not believe that the disputed documents  
3 warrant continued confidential treatment as proprietary or sensitive trade secret  
4 information.

5 RESPECTFULLY SUBMITTED this 17<sup>th</sup> day of November, 2017.

6 GALLAGHER & KENNEDY, P.A.

7 By: /s/ Mark S. O'Connor

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16 **CERTIFICATE OF SERVICE**

17 I hereby certify that on this 17<sup>th</sup> day of November 2017, I electronically transmitted  
18 the attached document to the Clerk's Office using the CM/ECF System for filing and  
19 transmittal of a Notice of Electronic Filing.

20 /s/ Gay Mennuti